

JAMES P. KEMP, ESQ.  
Nevada Bar No.: 6375  
VICTORIA L. NEAL, ESQ.  
Nevada Bar No.: 13382  
KEMP & KEMP  
7435 W. Azure Drive, Ste 110  
Las Vegas, NV 89130  
702-258-1183 ph/702-258-6983 fax  
jp@kemp-attorneys.com  
vneal@kemp-attorneys.com

*Attorneys for Plaintiff*  
*Antonio Torres*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANTONIO TORRES,

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada corporation;

Defendant.

Case No.: 2:17-cv-03114-JCM-VCF

**STIPULATED REQUEST TO  
CONTINUE STATUS CHECK  
HEARING AND ORDER**

**[SECOND REQUEST]**

Plaintiff Antonio Torres and Defendant Bellagio, LLC, by and through their respective counsel, file this Stipulated Request to Continue Status Check Hearing and Order. A Status Check hearing is presently scheduled on Friday, September 13, 2019, at 2:00 p.m.

The parties have been diligently working to complete the settlement agreement documents, which require the cooperation of a third-party health and welfare fund. The parties have encountered unexpected delays in finalizing the settlement agreement documents with the health and welfare fund due to technical and complex fund computation processes. The parties have jointly participated in conversations with the health and welfare administrator to ensure that the correct computations are formulated which has an effect on other calculations within the settlement structure and the final

1 disbursement of settlement proceeds. The parties are finalizing the calculations this week, and  
2 anticipate executing the settlement agreement very shortly. T the parties also need sufficient time to  
3 complete the settlement agreement process, payment process, and file a dismissal with prejudice,  
4 which the parties anticipate will take 30 days.

5  
6 At the upcoming hearing, the parties would provide the Court with the foregoing update and  
7 request a 30 day continuance in order to complete the settlement process. In the interest of avoiding  
8 unnecessary time, expense, and commitment of judicial resources, the parties have agreed to provide  
9 the Court with this update and request a continuance of the status check hearing.

10 This is the second Stipulated Request to continue the status check, and is not made for the  
11 purpose of delay.

12 Dated: September 11, 2019.

13 Respectfully submitted,

Respectfully submitted,

14 /s/ Victoria L. Neal  
15 JAMES P. KEMP, ESQ.  
16 VICTORIA L. NEAL, ESQ.  
17 KEMP & KEMP

/s/ Deverie J. Christensen  
DEVERIE J. CHRISTENSEN, ESQ.  
PHILLIP C. THOMPSON, ESQ.  
JACKSON LEWIS, P.C.

18 Attorneys for Plaintiff  
19 ANTONIO TORRES

Attorney for Defendant  
BELLAGIO, LLC

20 **ORDER**

21 **IT IS HEREBY ORDERED** that the Status Check Hearing is continued to:  
22 10:00 AM, October 21, 2019, in Courtroom 3D

23 If the parties file dismissal documents prior to date of the Status Check Hearing, it will be  
24 vacated.

25 September 11  
26 Dated: \_\_\_\_\_, 2019.

  
HON. CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE